

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 211

**SUPPLEMENTAL DECLARATION OF ROBERT J. DEHNEY, SR. IN FURTHER
SUPPORT OF THE DEBTORS' APPLICATION PURSUANT TO 11 U.S.C. §§ 327(a),
328(a), AND 1107(b); FED. R. BANKR. P. 2014 AND 2016; AND DEL. BANKR. L.R.
2016-1 FOR ENTRY OF AN ORDER AUTHORIZING RETENTION AND
EMPLOYMENT OF MORRIS, NICHOLS, ARSHT & TUNNELL LLP AS CO-
COUNSEL FOR THE DEBTORS *NUNC PRO TUNC* TO THE PETITION DATE**

I, Robert J. Dehney, Sr., hereby declare under penalty of perjury:

1. I am a partner at Morris, Nichols, Arsht & Tunnell LLP ("**Morris Nichols**"), which maintains an office for the practice of law at 1201 North Market Street, 16th Floor, Wilmington, Delaware 19801. I am an attorney at law, duly admitted and in good standing to practice in the state of Delaware as well as the United States District Court for the District of Delaware.

2. I submit this first supplemental declaration (the "**Supplemental Declaration**") in further support of the *Debtors' Application for Entry of an Order Authorizing Retention and Employment of Morris, Nichols, Arsht & Tunnell LLP as Bankruptcy Co-Counsel*

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

for the Debtors Nunc Pro Tunc to the Petition Date (D.I. 211) (the “**Application**”)² filed on September 18, 2024.

3. Except as otherwise indicated, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently hereto.³

4. As discussed in the Application, Morris Nichols obtained the names of individuals or entities that may be parties in interest in these chapter 11 cases (the “**Potential Parties in Interest**”) attached as **Exhibit A**.

5. Morris Nichols conducted, and continues to conduct, research into its relations with the Debtors, their creditors, and other parties in interest in these chapter 11 cases. In connection with this continued search, I am informed that Morris Nichols formerly represented Hostess Brands Inc. in matters unrelated to these chapter 11 cases. Should any additional information relevant to Morris Nichols’s retention and employment in the above-captioned cases come to Morris Nichols’s attention, Morris Nichols will file additional supplemental declarations.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: October 28, 2024

Wilmington, Delaware

/s/ Robert J. Dehney, Sr.
Robert J. Dehney, Sr.

² Capitalized terms not defined in this Supplemental Declaration are defined in the Application. Morris Nichols does not waive by the Application and this Supplement Declaration and their contents, and hereby reserves and preserves, all privileges.

³ Certain of the disclosures herein relate to matters within the knowledge of other attorneys at Morris Nichols and are based on information provided by them.